

Wiltshire Council Planning Consultation Response

15th January 2025

Helen Garside
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Verity Giles-Franklin
Officer's Title: Senior Planning Officer

Application No: PL/2025/09597 (LBC) and PL/2025/09565 (PP)
Conversion of the Existing Listed Building for 2No Two Bed Apartments and 4No 1 Bed apartments in a new 4 storey building at the rear 3 Fore Street, Trowbridge

Please find following comments in respect of the above application(s).

Recommendations:

☐	No comment
☒	Support in principle but significant further development/information required (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Site and assets considered: the Grade II* listed 3 Fore Street, adjacent grade II listed buildings and the designated conservation area.

National Policy and guidance: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-16 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Local Policy: The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

Proposal: The current proposal has been subject of a pre-application and seeks consent for the conversion of the Existing Listed Building for 2No Two Bed Apartments and 4No 1 Bed apartments in a new 4 storey building at the rear.

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance.

In this case, the applications are accompanied by a "Built Heritage Statement" which provides sufficient information to broadly understand development of the building and the general impact of the proposals although it lacks, in many areas, detailed assessment of the historic fabric impacted.

However, paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting: buildings are listed, under the Planning (Listed Building and Conservation Areas) Act 1990, for their architectural or historic interest. The NPPF defines this significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic or historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case, the building is a very significant former town house listed at Grade II*. It is located within an area which includes a number of very high-status houses built during the C18 for the wealthy mill owners of the town.

The list description reads as follows:

FORE STREET 1. 5411 Nos 2 and 3 (formerly listed as No 2 No 3 (Barclay's Bank)) ST 8558 4/82 29.12.50. II GV*

2. Older house, refronted circa 1700. 2 storey and attic. Ashlar stone. Projecting plinth. String at 1st floor level. Narrow moulded cornice and parapet with moulded coping. Formerly 4 now 3 tall carved vases on parapet (right hand missing). Stone tile roof. 3 pedimented dormers, the central segmental, with heavily moulded heads. each with 2 light casements, and decorative leadwork to front verges. 7 glazing bar sash windows with bracketted cills and stone architrave surrounds on 1st floor. 8-panel central door on ground

floor in stone doorcase of engaged Doric columns and entablature with block triglyph and rounded frieze, moulded cornice and segmental modillioned pediment. Barclay's Bank has modern windows to left hand of door and yard entry in left hand corner. The ground floor of No 2 altered and 'restored' with central replica Doric doorcase with segmental pediment, 6 panel door and steps protected by railings. Doorway flanked by glazing bar sashes with bracketted cills and moulded architraves. No 3 retains railing to an exiguous area and has been lately embellished by a projecting cast iron bank sign and ornate cast iron panelled standards with a lamp overthrow. In the east gable wall are traces of timber framing (now exposed) and in the roof and fine array of wind braces.

Nos 1 to 9 (consec) form a group.

The Built Heritage Statement provides some additional information and it is assumed that the building was originally constructed in the late medieval or early post medieval period as a single residence with a ground floor and high status first floor hall open to its high-quality roof structure. It is assumed that the first floor would have been ceiled to provide additional accommodation at attic floor at some later date. Evidence remains at ground and first floor for a large internal stack to the rear wall (now truncated above first floor) – it is unclear if this was the original means of heating or a later insertion and this is not discussed in the statement.

It was discussed at the pre-application site visit that further investigations would to be undertaken to determine whether a basement was present or not – I understand that this is the case but there is no reference to it in the submission.

Assessment:

Change of use

In this case it appears that a return to residential use may be to the asset's original use. Whilst the original use would have been as a single high status residence, the pre-application site visit undertaken, in combination with the heritage statement, provides further information which suggests that the subdivision of the main building into 2 should be achievable without causing significant harm. Furthermore, there is evidence of precedent for a building to the rear and it has been demonstrated that the works to achieve access to the building via a side passage also has precedent and will not involve the loss of significant historic fabric.

As a result, I have no further objection from a conservation perspective to the proposed change of use in principle.

Conversion of the historic building

The presumption of current policy and guidance however is towards conservation and the details of the conversion should be designed to maintain as much of the building's remaining historic character, fabric and features as possible. Regrettably very little additional information has been added since the pre-application. The proposals remain very much in principle with only indicative drawings available, at small scale. These provide little indication of the detailed impact of the proposals.

In general, there appears to be scope for the subdivision into two units and the provision of access to the rear without causing addition further harm. However, the details of the scheme remain to be determined and must be further developed, informed by the finding of the heritage appraisal. Issues which require resolution include (but are not limited to) the following examples:

As noted at pre-app, there is evidence of a large chimney stack to the rear of the historic building - the heritage statement offers no assessment of the significance of the stack even though it is a large structure, extant at both ground and first floors and may form part of the original construction. I note that the layout has been amended at ground floor to retain the stack (which is welcomed) but not at first floor, where the chimney breast and an historic fireplace are proposed for removal. It has not been demonstrated that this loss is justified – it does not appear to be incompatible with the scheme and I would expect a final scheme

for the first floor to allow for retention of the stack and remaining first floor fireplace. The sections have also not been updated to show the chimney stack and should be updated.

It is unclear how the remaining basement will be taken into account – its condition and significance should be assessed and provision made for any work required and for future access to allow for monitoring and repair where required.

There is very little information regarding the significance and historic form of the rear bay and the submitted information provides limited detail for its reinstatement.

There are references to a double height space at first floor but, although we would welcome the principle of enhancing the visibility of the very fine roof structure, this is not shown on the sections and there is no information at all as to how this would be achieved.

There is no information as to how remaining architectural details such as plasterwork and architraves at ground floor will be retained and enhanced as part of the scheme.

As advised at pre-application stage, an application should provide information in respect of how the scheme will be constructed and how the requirements of other legislation such as Building and Fire regulations are to be addressed. Whilst I noted that final details could be conditioned, broad strategies for achieving the conversion are required to accompany the submission to allow the full impact of the scheme to be assessed and taken into account and these should be specifically developed to take account of the building construction and fabric. However, whilst a few excerpts from publications are included in the current submission, there is no detail at all and no indication of how or where these relate to the building itself – as a result they provide little assistance.

General issues which will need to be addressed include the creation of acoustic and fire separation between units (particularly between the ground and first floors), means of escape provision and upgrading for thermal efficiency. Small items such as vents, heating and flues and meter and bin stores can also, cumulatively, be damaging to the character and appearance of a building and will need to be carefully resolved. Details of any more intrusive proposals for repair (for example, those which involve the replacement of finishes, fittings or structure and the introduction of new structure elements to secure the stability of the building) should also be described and will usually require consent, although a final repair schedule could be conditioned. The usual starting presumption is that historic fabric such as lathe and plaster and other historic finishes will be retained or, where beyond repair, replaced in a like for like manner.

Advice contained within the Historic England publication “Making Changes to Heritage Assets” - Historic England Advice Note 2 should be taken into account in developing the proposals. For example:

42 The historic fabric will always be an important part of the asset's significance, In normal circumstances, however, retention of as much historic fabric as possible, together with the use of appropriate materials and methods of repair, is likely to fulfil the NPPF policy to conserve heritage assets in a manner appropriate to their significance, as a fundamental part of any good alteration or conversion. It is not appropriate to sacrifice old work simply to accommodate the new.

45 The plan form of a building is frequently one of its most important characteristics....

50 Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance.

52 Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external, can have a considerable, and often cumulative, impact on the significance of a building.....

Rear block

The heritage statement provides evidence of the historic presence of a significant block to the rear, accessed via the side passageway entrance. Details of this historic structure remain unclear but there is obviously some precedent for the proposed four storeys in the neighbouring buildings and there is therefore no objection in principle, from a heritage perspective, to the new structure.

However, as with the main building, the details remain sketchy and appear to make little reference to the existing surroundings. An obvious point which immediately appears to be an issue is materiality – whilst brick and flint construction is found in vernacular development in the wider Wiltshire area and can offer an attractive finish for new development if carefully handled, it is not found in Trowbridge and fails to reflect the largely formal/polite character of architecture within this area. The design appears unresolved and details such as the complex rear elevation fenestration and glazing (with its large windows with multiple very small panes) appear both impractical in a modern development which must meet current regulations, and fail to reflect in any way the architectural precedents within the area.

The design should be reconsidered, based on thorough assessment of the surroundings and taking account of the requirements of CP57 to reinforce local distinctiveness. Details should include better information in respect of the form, materiality, architectural detailing and relationship of the new building to the neighbouring structures.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

In this case the principle of the development has potential to preserve the historic fabric and character of the building and the surrounding area and to release heritage benefits by virtue of the proposed investment in repair and upgrading/structural repair which could help to secure the future of the building. However, the scheme is currently insufficiently detailed and fails to demonstrate that this will be the case. As a result, there can be no confidence that the Council's statutory duties under Sections 16, 66 and 72 of the Act would met and, in the absence of additional work being undertaken and more information supplied, I would be unable to support the applications.